

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re U. S. Steel Consolidated Cases

Civil Action No. 17-579

Judge Cathy Bissoon

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff Christakis Vrakas and plaintiff Leeann Reed (collectively “Plaintiffs”), on behalf of themselves and the proposed Settlement Class, through their counsel, hereby move this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e) for entry of the Preliminary Approval Order (Exhibit A to the Stipulation)¹ and to:

(1) preliminarily approve the Settlement on the terms set forth in the Stipulation;

(2) certify, for settlement purposes only, the Settlement Class in connection with the Settlement;

(3) approve the form and content of the Notice, the Summary Notice, and Claim Form, attached as Exhibits A-1, A-2, and A-3 of the Stipulation;

(4) find that the procedures for distribution of the Notice and Claim Form and publication of the Summary Notice provided in the Preliminary Approval Order constitute the best notice practicable under the circumstances and comply with due process, Rule 23, and the Private Securities Litigation Reform Act of 1995 (“PSLRA”);

(5) set a date and time for the Final Approval Hearing, at which the Court will consider whether the proposed Settlement of the Action on the terms and conditions provided for in the Stipulation is fair, just, reasonable and adequate to the Settlement Class and should be approved by the Court, whether a Judgment as provided in the Stipulation should be entered herein, whether the proposed Plan of Allocation should be approved, to determine the amount of fees and Litigation Expenses that should be awarded to Lead Counsel, and to determine the amount of any award of

¹ Unless otherwise stated or defined, all capitalized terms used herein shall have the meanings provided in the Stipulation and Agreement of Settlement (the “Stipulation”) attached as Exhibit 1 to the Declaration of Shannon L. Hopkins in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (“Hopkins Decl.”).

costs and expenses of Plaintiffs; and

(6) appoint A.B. Data, Ltd. as the claims administrator to administer the Settlement process.

The U. S. Steel Defendants do not oppose the relief requested in this motion.

This motion is based on the accompanying Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration of Shannon L. Hopkins, dated May 20, 2022, and the annexed exhibits each filed herewith. A proposed Preliminary Approval Order, which was negotiated by the Parties to the Settlement, with annexed exhibits, is also submitted herewith.

DATED: May 20, 2022

Respectfully submitted,

By: /s/ Vincent Coppola

Vincent Coppola, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2022, I served a copy of the foregoing document on all appearing counsel through the Court's ECF system.

/s/ Vincent Coppola
Vincent Coppola